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Attorneys for Plaintiff
PragmaticPlay International Ltd.

**UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA**

PragmaticPlay International Ltd.,
Plaintiff,
v.
Agenpragmaticplay.live and 80 additional
domain names,
Defendants.

Case No. 2:23-cv-00497-DLR

**STIPULATION FOR ENTRY OF
CONSENT JUDGMENT WITH
RESPECT TO DEFENDANT
PRAGMATICPLAY.CODES**

Plaintiff PragmaticPlay International Ltd. (“Plaintiff”) and the owner of the Defendant domain name PragmaticPlay.codes, Andrejs Beketovs (collectively, the “Parties”), hereby stipulate and agree to the following terms, and seek the Court’s entry of consent judgment as follows:

1 WHEREAS, on March 23, 2023, Plaintiff initiated this action asserting violations of
2 the Anti-Cybersquatting Consumer Protection Act, 15 U.S.C. § 1125(d), against 81
3 Defendant domain names;

4 WHEREAS, PragmaticPlay.codes is one of the 81 Defendant domain names in this
5 action;

6 WHEREAS, Andrejs Beketovs owns all rights, title, and interest in
7 PragmaticPlay.codes and is empowered to enter into agreements regarding its disposition;

8 WHEREAS, the parties wish to resolve the dispute raised in this action;

9 WHEREAS, PragmaticPlay.codes is currently locked by its domain registrar
10 NameCheap, Inc. as required by 15 U.S.C. 1125(d)(2)(D)(i), preventing transfer of the
11 domain during the pendency of this action absent the Court's order.


12 ACCORDINGLY, the Parties stipulate and seek entry of Consent Judgment pursuant
13 to Rule 54 of the Federal Rules of Civil Procedure, on the following terms:

- 14 1. Judgment will be entered in favor of Plaintiff on Count I of the Complaint pursuant
15 to 15 U.S.C. 1125(d) as to PragmaticPlay.codes.
- 16 2. NameCheap, Inc. will be directed to unlock PragmaticPlay.codes and take all
17 necessary steps to effectuate transfer of PragmaticPlay.codes to Plaintiff.
- 18 3. Plaintiff and the owner of PragmaticPlay.codes shall each bear their own costs and
19 attorneys' fees incurred in connection with this action.
- 20 4. This Court shall retain jurisdiction for the purpose of making any further orders
21 necessary or proper for the construction or modification of this Consent Judgment,
22 the enforcement thereof, or the punishment of any violations thereof.
- 23 5. The prevailing party in any proceeding to enforce the terms of this Consent
24 Judgment shall be entitled to an award of his attorneys' fees and costs.

25 The undersigned hereby stipulate to the above facts and conclusions and consent to
26 the entry of Consent Judgment on the foregoing terms. Signatures to this Stipulation may
27 be obtained and exchanged by scanned copy and/or facsimile.
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1 RESPECTFULLY SUBMITTED this ____ day of _____, 2023.

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3 **THORPE SHWER, P.C.**

4 
5 By _____
6 William L. Thorpe
7 Sara R. Witthoft

8 &

9 **WILEY REIN LLP**

10 By 
11 David E. Weslow (admitted *pro hac vice*)
12 Adrienne J. Kosak (admitted *pro hac vice*)
13 Ari Meltzer (admitted *pro hac vice*)

14 *Attorneys for Plaintiff PragmaticPlay*
15 *International Ltd.*

16 By 
17 Andrejs Beketovs

18 *On behalf of himself and PragmaticPlay.codes*
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